

3. The Times therefore, in an abundance of caution, seeks a separate order entering the previously requested two-week extension of the deadline to file its reply memoranda.

4. Providing The Times with the requested relief will not prejudice either party.

5. Plaintiff consents to this motion.

WHEREFORE, for the reasons stated above, The Times respectfully requests that this Court enter an Order:

A. Extending The Times's deadline to file reply memoranda in further support of its motion to dismiss and special motion to dismiss to March 1, 2019; and

B. Providing the parties any further relief deemed necessary and appropriate by this Court.

Dated: February 11, 2019

Respectfully submitted,

BALLARD SPAHR LLP

/s/ Jay Ward Brown

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February 2019, a true and correct copy of the foregoing was filed with the Court through the electronic filing system, which will automatically serve electronic notice of the same on all counsel of record.

/s/ Jay Ward Brown

Jay Ward Brown

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